

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:21-cr-00035-BR

v.

INDICTMENT

MICHAEL WAYNE LYON,

Defendant.

18 U.S.C. § 2251(a), (e)

18 U.S.C. § 2261A(2)

FORFEITURE ALLEGATION

THE GRAND JURY CHARGES:

COUNT 1

**(Using a Minor to Produce Visual
Depiction of Sexually Explicit Conduct)
(18 U.S.C. § 2251(a), (e))**

On or about March 22, 2018, in the District of Oregon and elsewhere, defendant **MICHAEL WAYNE LYON**, knowingly and unlawfully employed, used, persuaded, induced, enticed, and coerced "MV1," a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of said conduct, and did attempt to do so, said depictions having been produced using materials that had been mailed, shipped or transported in or affecting interstate or foreign commerce by any means, including by a computer, and defendant knew or had reason to know said visual depictions would be shipped and transported in interstate and

foreign commerce, and were in fact shipped and transported in interstate and foreign commerce by any means including by a computer;

In violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 2
(CyberStalking)
(18 U.S.C. § 2261A(2))

Beginning on or about March 2018 and continuing through October 2020, in the District of Oregon and elsewhere, defendant **MICHAEL WAYNE LYON**, with the intent to harass, and intimidate another person, namely MV1, in another state, namely, Oregon, used an electronic communication system or any other facility of interstate or foreign commerce, including internet-based communications, to engage in a course of conduct that caused substantial emotional distress to MV1 and placed MV1 in reasonable fear of death or serious bodily injury to MV1 and MV1's immediate family members;

In violation of Title 18, United States Code, Sections 2261A(2).

FORFEITURE ALLEGATION

Upon conviction of Count 1 of the indictment, defendant **MICHAEL WAYNE LYON** shall forfeit to the United States pursuant to 18 U.S.C. § 2253 any property, real or personal, that was used or intended to be used to commit or promote the commission of said violation or any property traceable thereto, and any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense.

If any of the above described forfeitable property, as a result of any act or omission of the defendant:

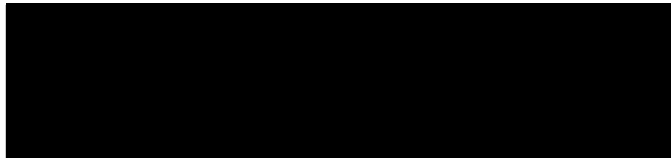
- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

Dated: February 2nd, 2021

A TRUE BILL.



OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney

A handwritten signature in black ink, appearing to read 'P. Paaso', written over a horizontal line.

PAMELA PAASO, TXSB#24060371
Assistant United States Attorney